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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

|                                  |   |                                 |
|----------------------------------|---|---------------------------------|
| AYAD A.S. o/b/o L.A.A.A.S.,      | ) | Case No.: 2:23-cv-02981-CKD     |
| Plaintiff,                       | ) | STIPULATION FOR AN EXTENSION OF |
| vs.                              | ) | TIME; ORDER                     |
| MARTIN O'MALLEY,                 | ) |                                 |
| Commissioner of Social Security, | ) |                                 |
| Defendant.                       | ) |                                 |

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from June 5, 2024, up to and including July 5, 2024. This is the Defendant's first request for an extension.

The undersigned counsel for Defendant ("Counsel") makes this request in good faith and for good cause. Counsel currently has three briefing deadlines in a period of two workdays, including this matter; in May 2024, Counsel also had two Ninth Circuit briefing deadlines, oral argument and mediation in the Ninth Circuit, and seven other district court briefing deadlines. Although Counsel has worked diligently on this matter and other assigned cases, this extension is necessary.

1 The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.

3  
4 Respectfully submitted,

5 Dated: June 4, 2024

/s/ Jesse S. Kaplan\*

6 JESSE S. KAPLAN

7 Attorney for Plaintiff

(\*signature authorized via e-mail June 4, 2024)

8  
9 Dated: June 4, 2024

PHILLIP A. TALBERT

10 United States Attorney

MATHEW W. PILE

11 Associate General Counsel

12 Office of Program Litigation, Office 7

13 By: /s/ Michael J. Mullen

14 MICHAEL J. MULLEN

15 Special Assistant U.S. Attorney

16 Attorneys for Defendant

17 **ORDER**

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19 Pursuant to the parties' Stipulation, and for good cause shown, IT IS SO ORDERED that  
20 Defendant shall have an extension of 30 days, to July 5, 2024, to file the Commissioner's  
21 responsive brief.

22 Dated: June 10, 2024

23 

24 CAROLYN K. DELANEY

25 UNITED STATES MAGISTRATE JUDGE  
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